

November 19, 2024

**VIA ECF**

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007

**Re: *Relevant Sports, LLC v. United States Soccer Federation, Inc.*,  
No. 19-cv-8359 (VEC)**

Dear Judge Caproni:

Further to the parties' joint status letter filed on November 15, 2024, the parties submit this supplemental status update regarding certain agreements reached with respect to document discovery in this action.

***ESI Protocol.*** The parties are near agreement on an ESI protocol.

***RFP Negotiations.*** The parties agreed to complete negotiations over Relevant's existing Requests for Production to USSF ("Relevant RFPs") and USSF's existing Requests for Production to Relevant ("USSF RFPs") by the end of this calendar year. These negotiations will include issues pertaining to custodians, search terms, and scope of the requests. The parties are scheduled to meet-and-confer on Tuesday, November 19.

***Temporal Scope.*** The parties previously agreed to a relevant time period for each of the requests in the Relevant RFPs. Subsequently, the USSF RFPs sought relevant time periods that were more expansive than what was agreed to for the Relevant RFPs. Accordingly, to the extent that Relevant agrees to produce documents from a date range that is larger than the date range USSF has agreed to for the Relevant RFPs, USSF will consider reciprocally expanding the previously agreed upon timeframe for the Relevant RFPs. To avoid multiple collections, the parties will prioritize negotiations regarding the temporal scope of the USSF RFPs.

***Productions.*** The parties will each begin making rolling productions of documents to the Relevant RFPs and USSF RFPs, respectively, on or before February 15, 2025. The parties will substantially complete those document productions by April 11, 2025.

[signature page follows]

Respectfully submitted,

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